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*Attorneys for Defendants Listed on
Exhibits A & B Attached to the October 31, 2013
Notice of Motions to Dismiss*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Liquidation of Ber-
nard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBITS A and B AT-
TACHED TO THE NOTICE OF MOTIONS TO DIS-
MISS,

Defendants.

Adv. Pro. Nos. listed on Exhibits A and B
to Notice of Motions to Dismiss

**DECLARATION OF HELEN DAVIS CHAITMAN, ESQ.
IN FURTHER SUPPORT OF DEFENDANTS' MOTIONS TO DISMISS**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a partner with Becker & Poliakoff LLP (“B&P”), counsel to defendants listed on Exhibits A and B attached to the Notice of Motions to Dismiss.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the June 3, 2011 letter from United States Representatives Scott Garrett, Peter King, Ileana Ross-Lehtinen and Carolyn McCarthy to Gene L. Dodaro, Comptroller General of the United States.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the September 13, 2013 letter from the Securities Investor Protection Corporation to United States Representatives Scott Garrett and Carolyn Maloney in response to their letter of August 30, 2013.

Dated: February 21, 2014
New York, New York

/s/ Helen Davis Chaitman